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**SITE ASSESSMENT/REMOVAL ACTION REPORT
FOR
DC FRANCHE METAL COATINGS
CHICAGO, COOK COUNTY, ILLINOIS
TDD: T05-9504-015
PAN: EIL0884VAA**

June 5, 1995

**Prepared for:
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Date: 6/5/95

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Date: 6/5/95



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1. INTRODUCTION

The United States Environmental Protection Agency (U.S. EPA) tasked the Ecology and Environment, Inc. (E & E), Technical Assistance Team (TAT) to assist the U.S. EPA On-Scene Coordinator (OSC) Brad Benning in performing a site assessment (SA) of the DC Franche Metal Coatings (DC Franche) site in Chicago, Illinois. TAT was requested under Technical Direction Document (TDD) T05-9504-015 to prepare and implement a Health and Safety Plan; compile background information; conduct a site assessment; perform air monitoring and sampling; document on-site activities; and evaluate threats to human health and the environment at this site.

2. SITE BACKGROUND

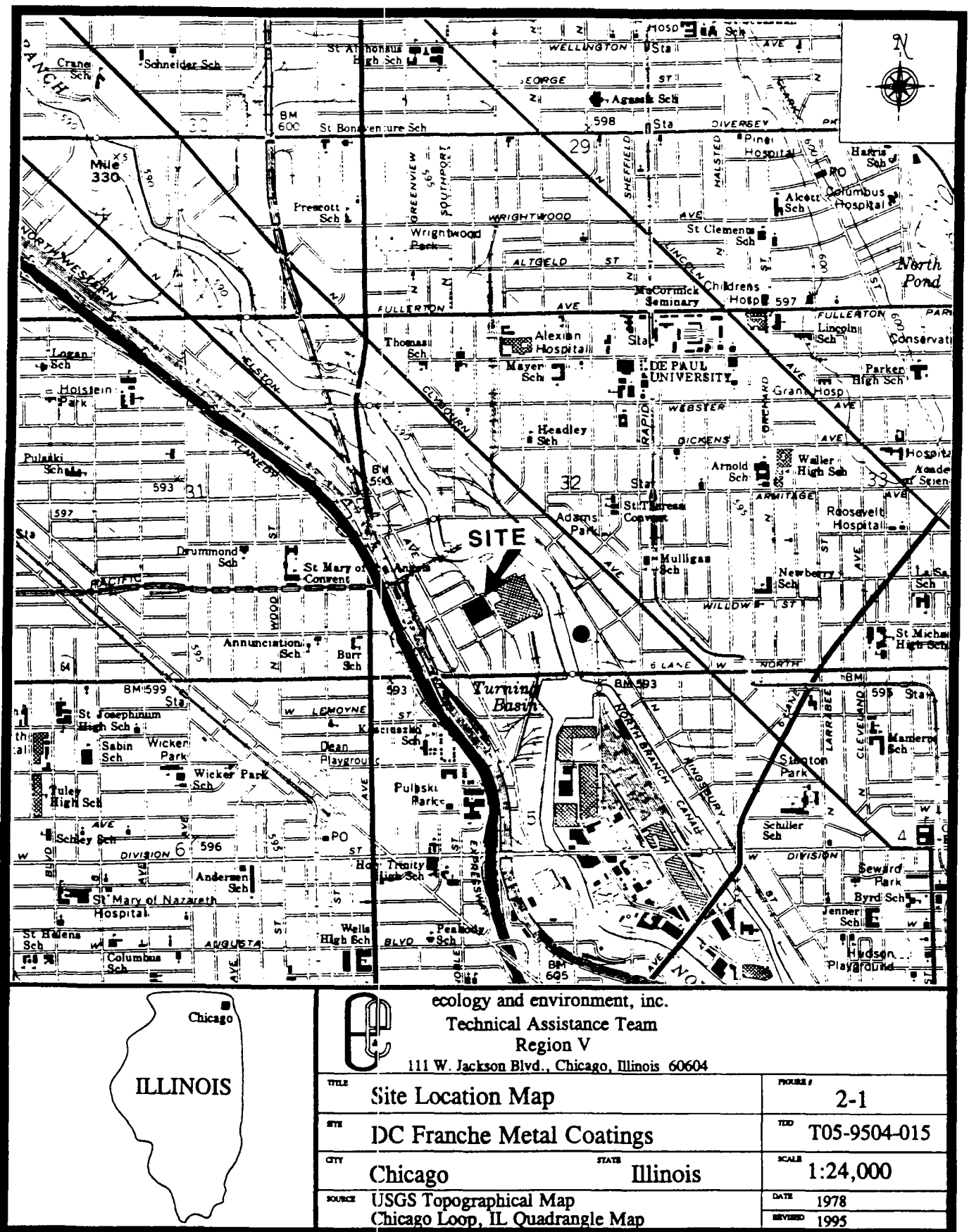
2.1 SITE DESCRIPTION

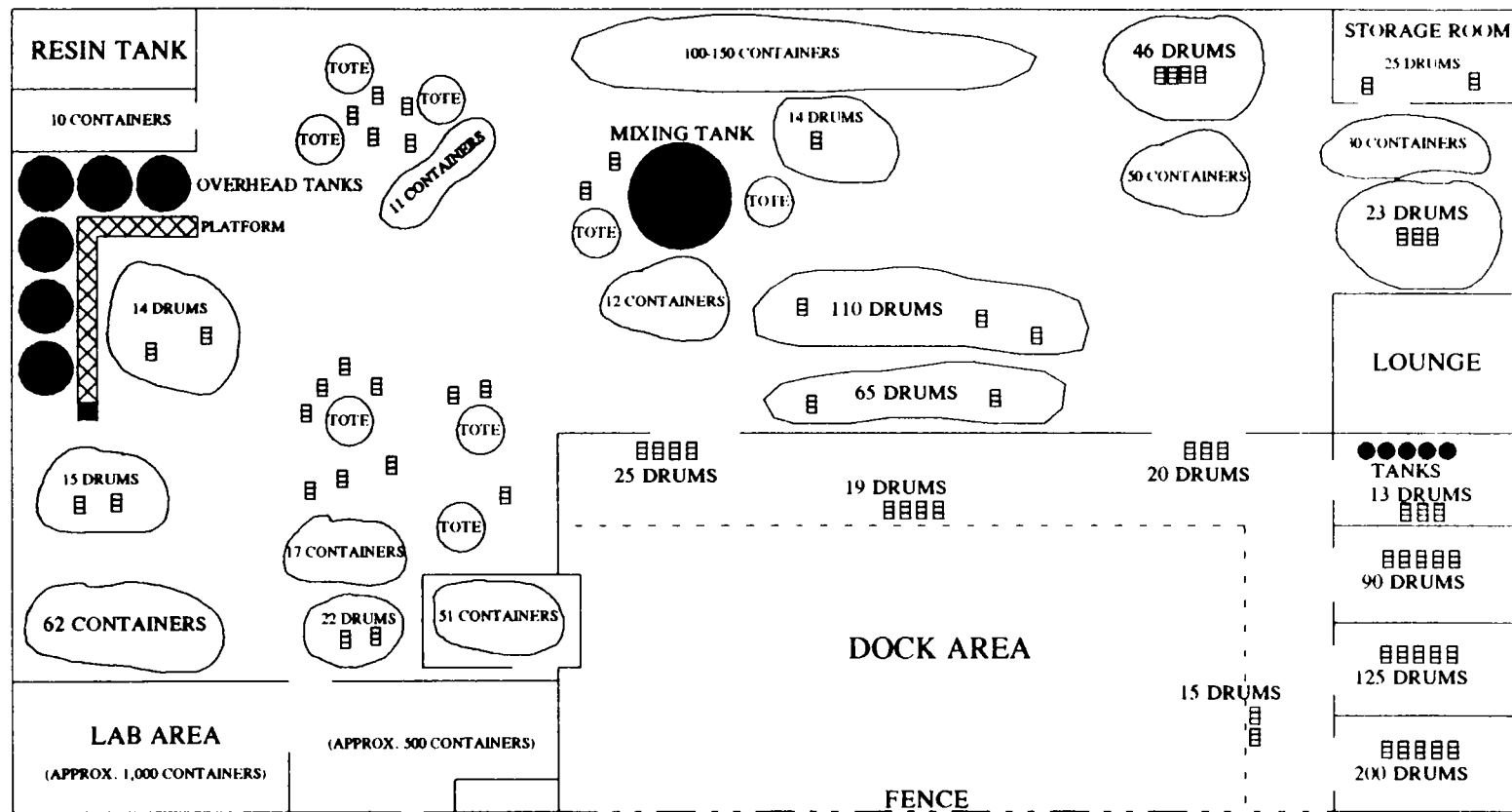
The DC Franche site is located at 1401 Wabansia Avenue in Chicago, Cook County, Illinois (Figure 2-1). The DC Franche site is an abandoned facility which manufactured custom coatings and finishes for the industrial paint business from 1929 to January 1995. The site is situated in a mixed industrial and residential area.

The site is approximately 5 acres in size and encompasses one large warehouse building containing approximately 875 55-gallon drums, 2,000 containers, and 30 tanks of paints, solvents, and resins (Figure 2-2). The site is surrounded by a barbed-wire-topped chain-link fence.

2.2 SITE HISTORY

The DC Franche site began operations in 1929. The facility's solvent and water-based products consisted of primers, enamels, lacquers, vinyl coatings, stains, polyurethanes, epoxies, latex paints, thinners, and reducers. The facility ceased all operations in January 1995.





WABANSIA AVENUE

LEGEND

= DRUMS

= 300-GALLON MOVEABLE TANK



ecology and environment, inc.
Technical Assistance Team
Region V

DATE	SITE FEATURES MAP	REVISION #	2-2
DATE	DC FRANCHE METAL COATING	DATE	Not to scale
DATE	CHICAGO	DATE	IL
DATE		DATE	TOS 9504 015

3. SITE ASSESSMENT

On May 4, 1995, two TAT members (TATMs), John Sherrard and Brigid Brooks, arrived at the DC Franche site at 0930 hours and met with U.S. EPA OSC Brad Benning, OSC Charlie Gebien, Chicago Department of the Environment (CDOE) representative Pete Badillo, U.S. EPA Enforcement Specialist Bill Ryczek, and Michael Shields from Manufacturers Bank.

After review of the Site Safety Plan, TAT performed a site reconnaissance, which included air monitoring in the vicinity of the drums, containers, and tanks. See Appendix A for photographs of site conditions. The site reconnaissance confirmed CDOE's observations from their previous inspections. A total of approximately 875 drums, 2,000 containers, and 30 tanks, all abandoned and uncontrolled, were identified in the facility. Some of the drums and containers were marked with the following labels: "acetone", "toluene", "methyl ethyl ketone", "isobutyl alcohol", "xylene", "cymel 245-8 resin", "propasol solvent", and "isopropyl acetate". Most of the drums were marked "FLAMMABLE LIQUID" or "FLAMMABLE SOLID". One label read "FLASH POINT - 110 °F". Many of the drums appeared to be leaking and in a deteriorating condition. Approximately 400 of the drums were stacked three rows high in the outside bay garage areas next to the loading dock. In a few areas of the building, the roof was leaking water onto the areas where the drums were staged.

Air monitoring for organic vapors in the breathing zone exhibited readings of 2 to 4 parts per million (ppm) above background levels. Air monitoring for oxygen levels in the breathing zone around the drums indicated safe oxygen levels. Headspace readings of two opened drums indicated 100 ppm and 150 ppm on the photoionization detector (PID). Oxygen levels were normal and no explosive atmospheres were detected during headspace monitoring activities.

After the reconnaissance was completed, OSC Benning determined drum sample locations based on elevated PID readings. A total of four drum samples were collected.

TATM Sherrard collected the four drum samples. Sample L-1 was a grab sample collected from a container labeled "CORROSIVE". A field pH test was used to verify corrosivity. Sample L-1 consisted of a colorless, viscous liquid. Sample L-2 was a grab sample collected from a 5-gallon bucket in the laboratory room. Sample L-2 consisted of a blue liquid that had a headspace reading of 10 ppm on the PID. Sample L-3 was a grab sample collected from a drum labeled as containing sulfonic acid in xylene. Sample L-3 had a headspace reading of 40 ppm on the PID. Sample L-4 was collected from a drum with an alkyd resin solution label.

Following collection, the four samples were prepared for shipment to the laboratory. Chemical analysis of all samples was performed by Heritage Laboratories in Romeoville, Illinois, under analytical TDD T05-9505-803. A Quality Assurance Level II was requested from the laboratory as well as a one-week verbal and two-week hard-copy turnaround time on the analytical results.

4. ANALYTICAL RESULTS

Sample L-1 was analyzed for pH and samples L-2 to L-4 were analyzed for flash point. Analytical results indicated that sample L-1 had a pH of less than 1 standard unit. Samples L-2 to L-4 all had flash points of under 70 °F. The analytical data have been validated by E & E's Quality Assurance/Quality Control (QA/QC) department and approved for use in this report. See Appendix B for analytical data results.

5. DISCUSSION OF POTENTIAL THREATS

Conditions at the DC Franche site present an imminent and substantial endangerment to human health and the environment, based upon factors set forth in paragraph (b) (2) of Part 300.415 of the National Oil and Hazardous Substances Contingency Plan (NCP). The following conditions exist at the DC Franche site:

- **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:**

Site investigations conducted by U.S. EPA and CDOE documented that approximately 875 drums, 2,000 containers, and 30 tanks full or partially full of hazardous waste were present on site in an uncontrolled, deteriorating, and, in some cases, leaking condition. According to chemical analysis results of drum samples collected during the site assessment, paint and solvent-bearing wastes containing significant concentrations of volatile organics were present in the liquid and sludge drummed waste. In addition, sample L-1 consisted of a liquid with a pH of less than 1 standard unit. According to paragraph (a)(1) of 40 CFR Section 261.22, an aqueous liquid with a pH of less than or equal to 2, or greater than or equal to 12.5, is considered to exhibit the criteria for corrosivity. Samples L-2, L-3, and L-4 had flash points of less than 140 °F. According to the Resource Conservation and Recovery Act (RCRA), 40 CFR 261.21, wastes exhibiting the hazardous characteristic of ignitability at a flash point of less than 140 °F must be designated as U.S. EPA hazardous waste code D001. Site access to trespassers, vandals, and wildlife is only partially restricted. Deteriorating containers of hazardous substances pose a threat of direct contact. During the site assessment, moderate automobile and pedestrian traffic was observed on Wabansia Avenue and the surrounding area.

- **Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.**

Results of pH analysis, flash point analysis, and the labels on the containers themselves reveal the presence corrosive liquids and flammable liquids and solids. Many of the containers of hazardous or potentially hazardous materials are in poor condition, leaking, or have already released most of their contents. The uncontrolled and deteriorating state of the drums and the fact that some drums were observed to be leaking could pose a further, more significant threat of release and allow contaminants to be transported off site into nearby soils and storm sewer systems.

- **Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.**

The numerous drums, containers, and tanks abandoned at the DC Franche site are exposed to varying seasonal temperatures which, if not immediately and properly dealt with, could cause further deterioration and ultimate failure of drums. This could occur through freeze/thaw cycles in which high temperatures could increase vapor pressures of the contained material while cold temperatures may cause frozen drum contents. Conditions such as these could result in a release that could pose a public and environmental hazard.

- **Threat of fire or explosion.**

The contents of three of the sampled drums were determined to contain flammable and combustible materials. Samples L-2, L-3, and L-4 had flash points of 68 °F, 66 °F, and 69 °F respectively (40 CFR 261.21, D001 - ignitability). These samples were collected from drums that are exposed to extreme weather conditions and are close to pedestrian traffic and commercial businesses.

- **The unavailability of other appropriate Federal or State response mechanisms to respond to the release.**

This factor supports the proposed actions at the facility because the Illinois Environmental Protection Agency (IEPA) does not have the necessary resources to respond to an emergency situation.

6. SUMMARY

The DC Franche site is located in a mixed residential/industrial area. The majority of the drums on site are located within 40 feet of a pedestrian walkway and are within plain view. The contents of most of the drums, containers, and tanks found on site consist of flammable materials. Several of these drums have already released their contents. In addition, during periods of elevated temperatures, the contents of the drums pose the potential of becoming less viscous and migrating off the site property. These drums pose a threat to human health and the environment and should be disposed of in a proper and timely manner.

7. REMOVAL COST ESTIMATE

Mitigation of the threats described above requires the removal of the approximately 875 drums, 2,000 containers, and 30 tanks of corrosives, paint wastes, acetones, solvents, glues, and flammables. A two-phase removal action plan culminating in off-site disposal is as follows.

7.1 REMOVAL ACTION - PHASE I

Phase I of the removal action would begin with the mobilization of the Emergency Response Cleanup Contractor Service (ERCS) to the site, the development of a site safety plan, securing the site, staging the drums and containers for sampling, hazard categorization of materials in each container and separation of drums into appropriate hazardous waste streams, compositing waste streams, sending out waste stream composite samples for disposal parameters analysis, and sending composites to the appropriate disposal facilities for waste approval.

7.2 REMOVAL ACTION - PHASE II


Phase II of the removal action would consist of bulking the contents of the drums and containers with flammable characteristics for disposal at a fuels blending facility, and shipping drums containing corrosive liquids for disposal at a treatment facility. Disposal of all site wastes would be followed by demobilization from the DC Franche site.

7.3 ESTIMATED COSTS

The cost estimation prepared for the mitigation of threats at the DC Franche site addresses the disposal of all drums, containers, and tanks on site. Estimated costs are based on fuels blending 65,000 gallons of flammable liquids and transporting 10 drums of corrosive liquids for treatment by neutralization, which includes a 20% contractor contingency factor and a 15% site contingency factor. The disposal of the drums, containers, and tanks and their contents is estimated to require 80 10-hour


working days plus mobilization and demobilization time; the cost would be approximately \$705,075. The cost estimate was generated by the Removal Cost Management System (RCMS), version 4.2. A copy of the cost estimate and the assumptions used is presented in Appendix C.

APPENDIX A
SITE PHOTOGRAPHS



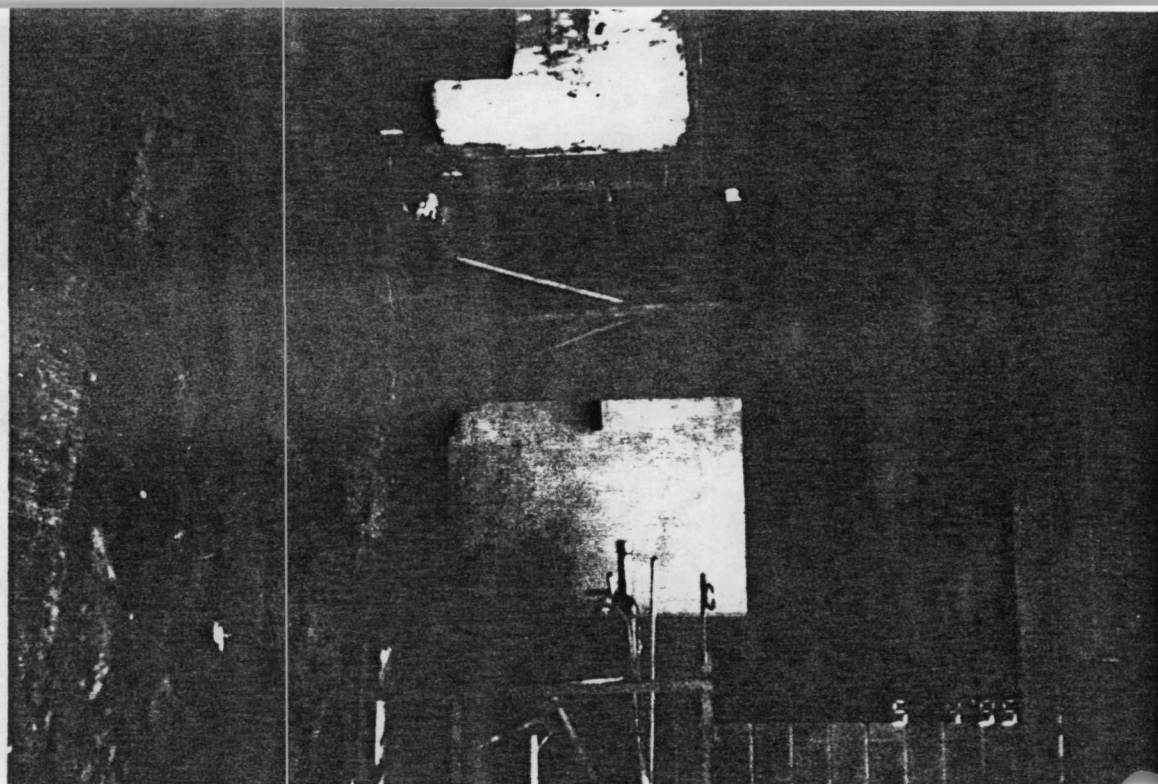
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PHOTOGRAPHER: BRIGID BROOKS

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SUBJECT: VIEW OF DRUMS IN LOADING DOCK AREA.



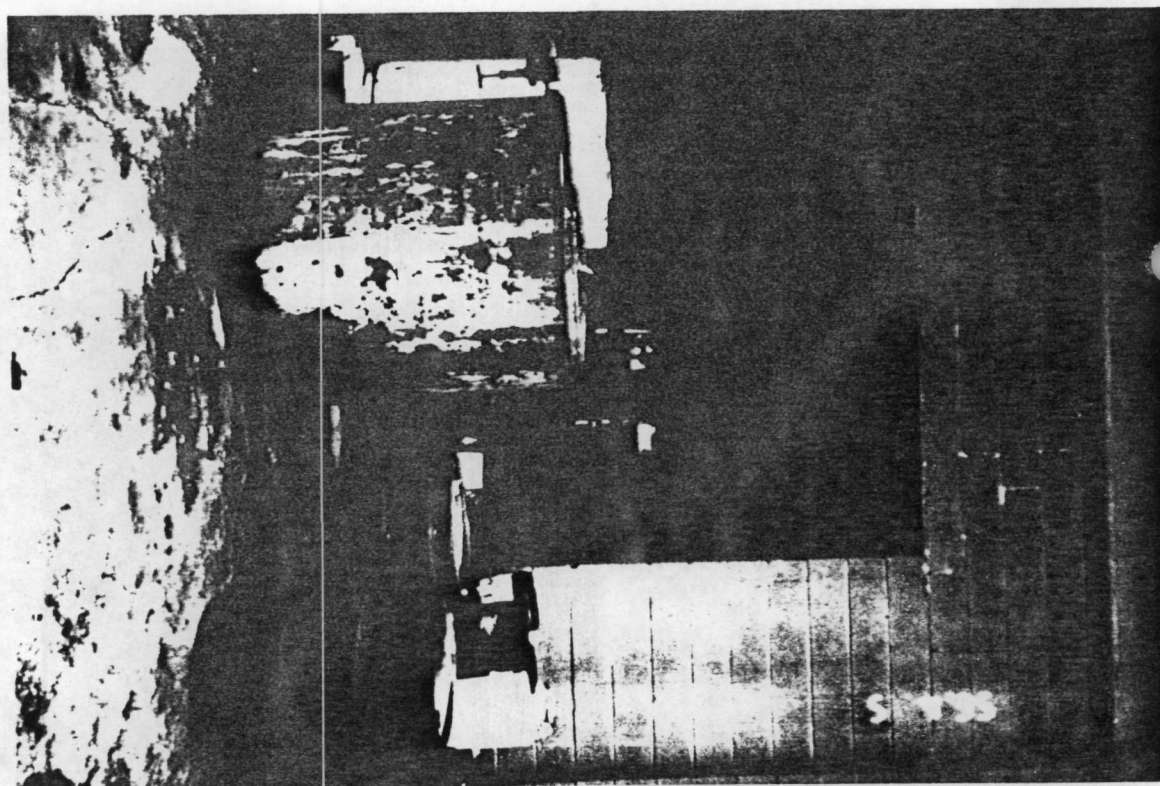
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SUBJECT: VIEW OF PROCESS AREA WITHIN ABANDONED FACILITY.



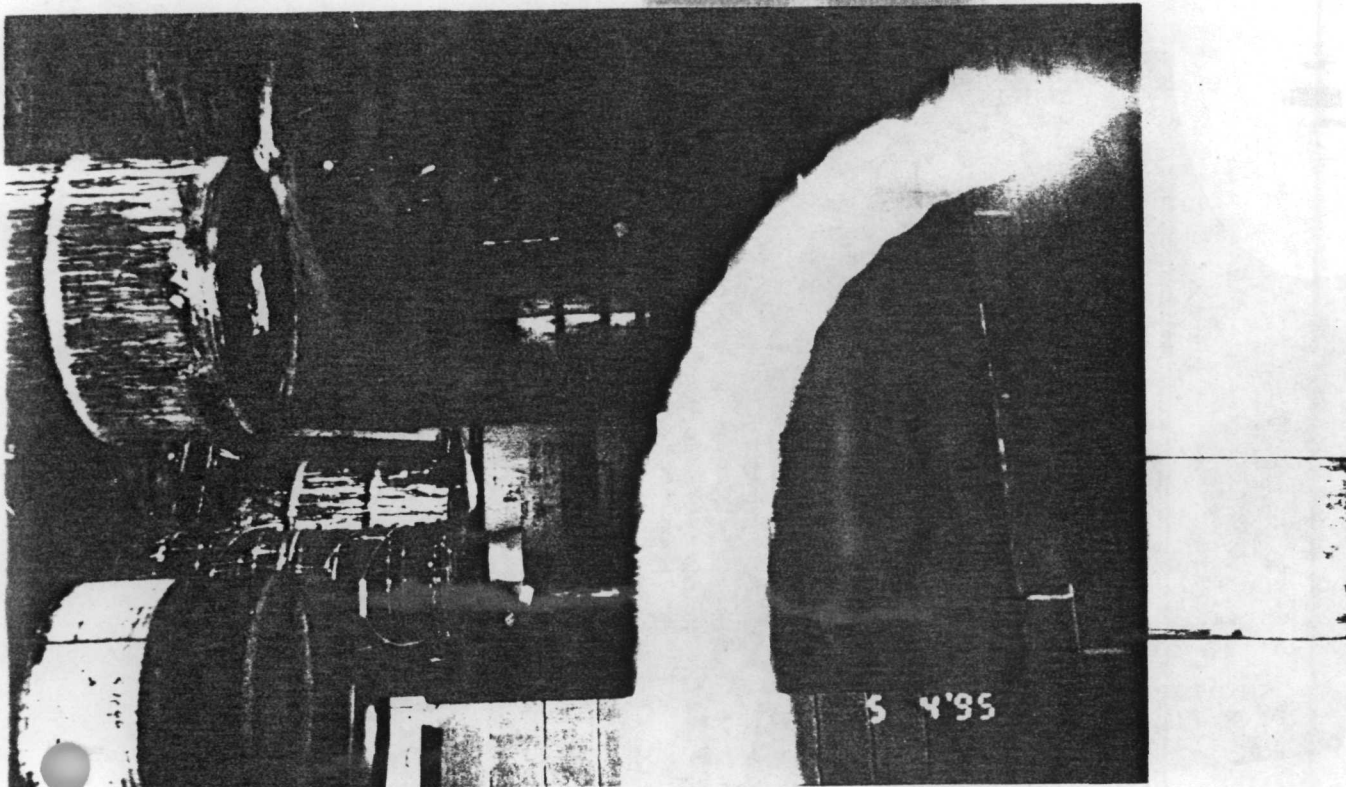
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 PHOTOGRAPHER: BRIGID BROOKS

CAMERA: FUJI DISCOVERY PLUS 80
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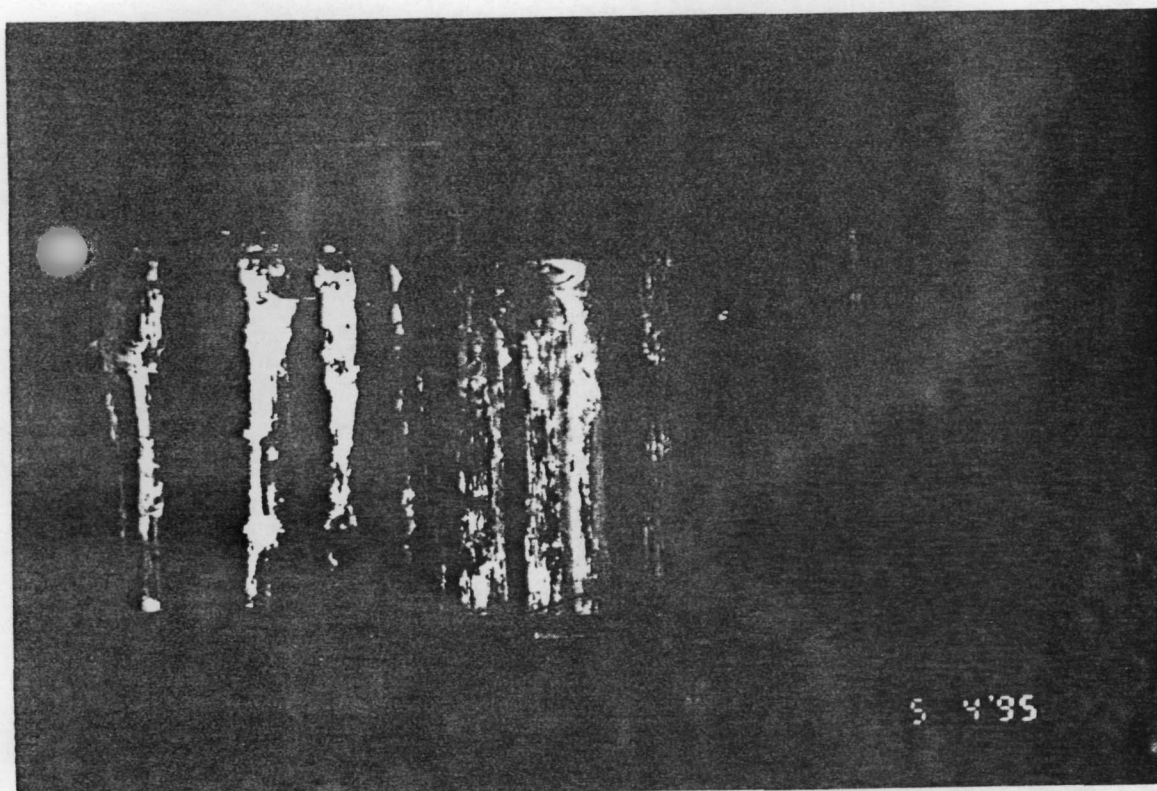
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CAMERA: FUJI DISCOVERY PLUS 80
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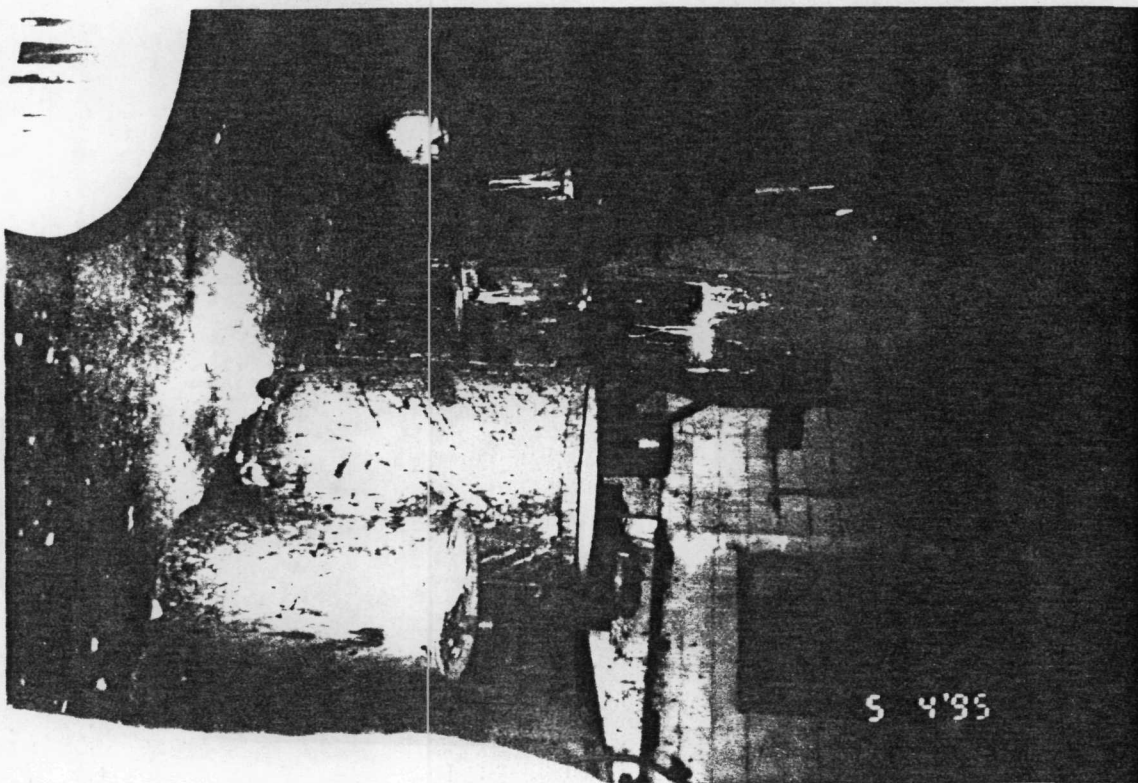
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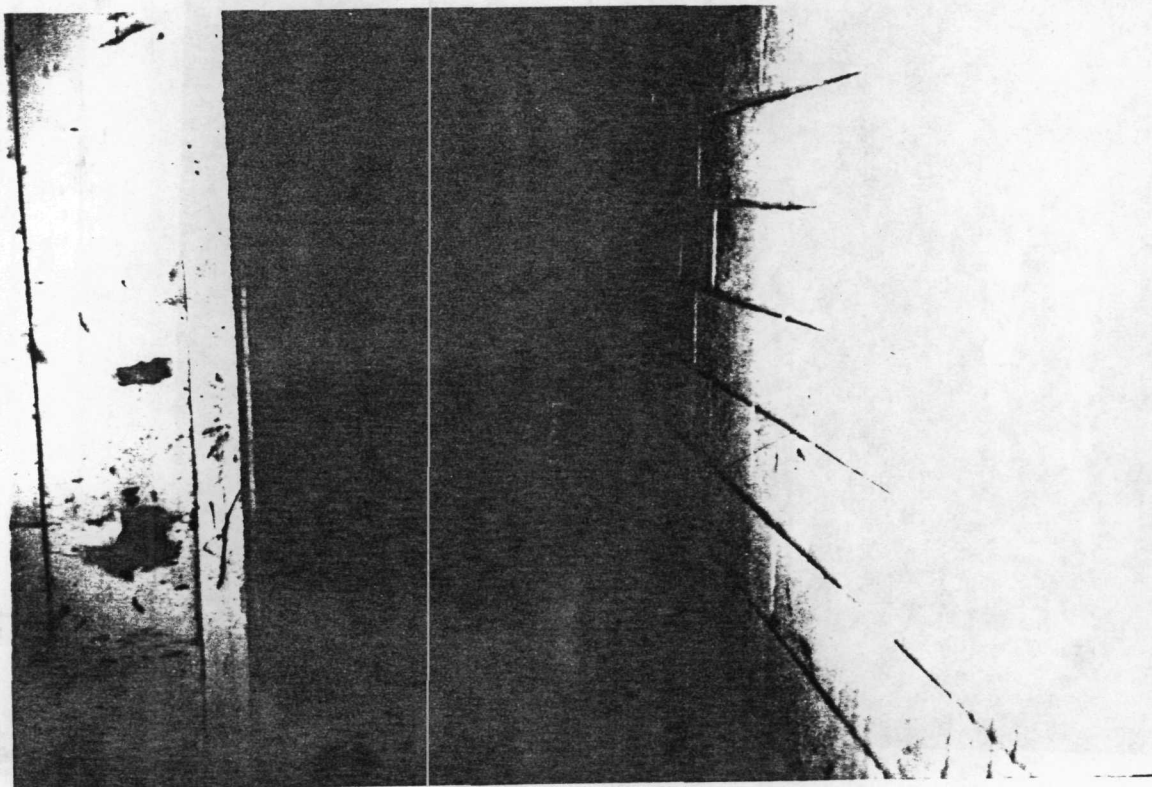
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CAMERA: FUJI DISCOVERY PLUS 80
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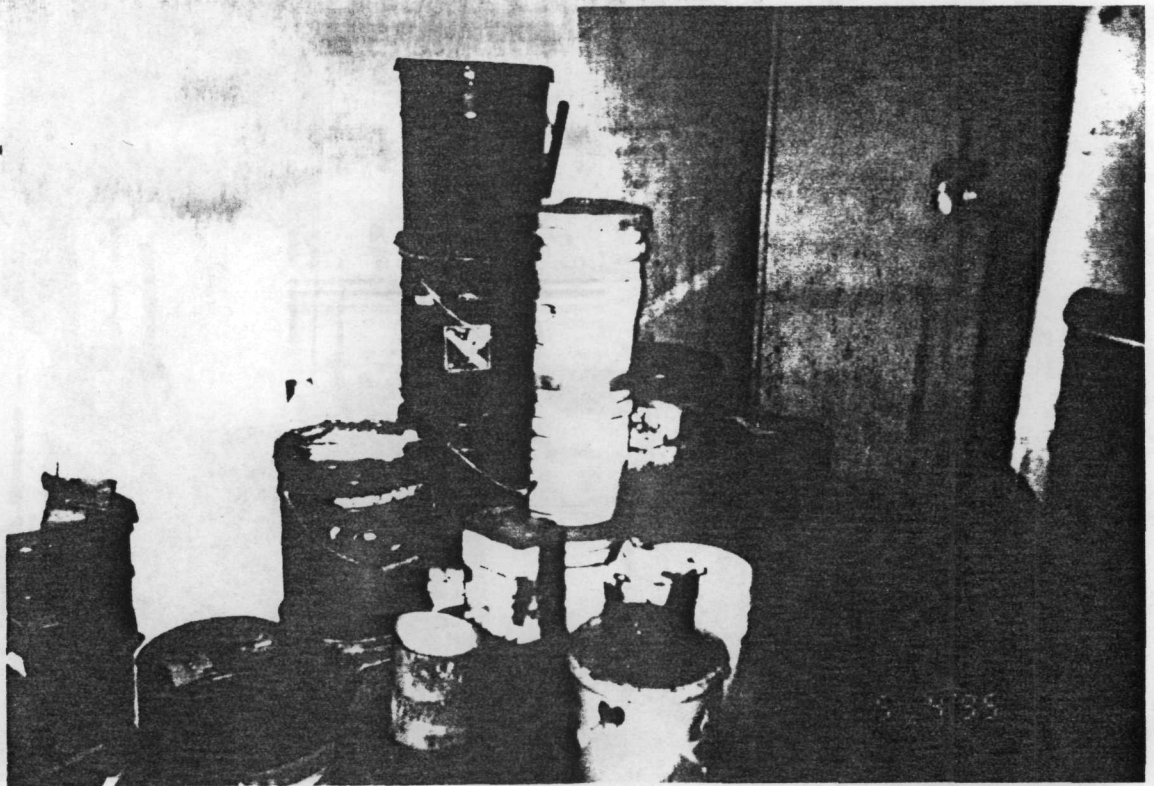
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 SUBJECT: VIEW OF LEAKING TANK AND MISCELLANEOUS CONTAINERS.



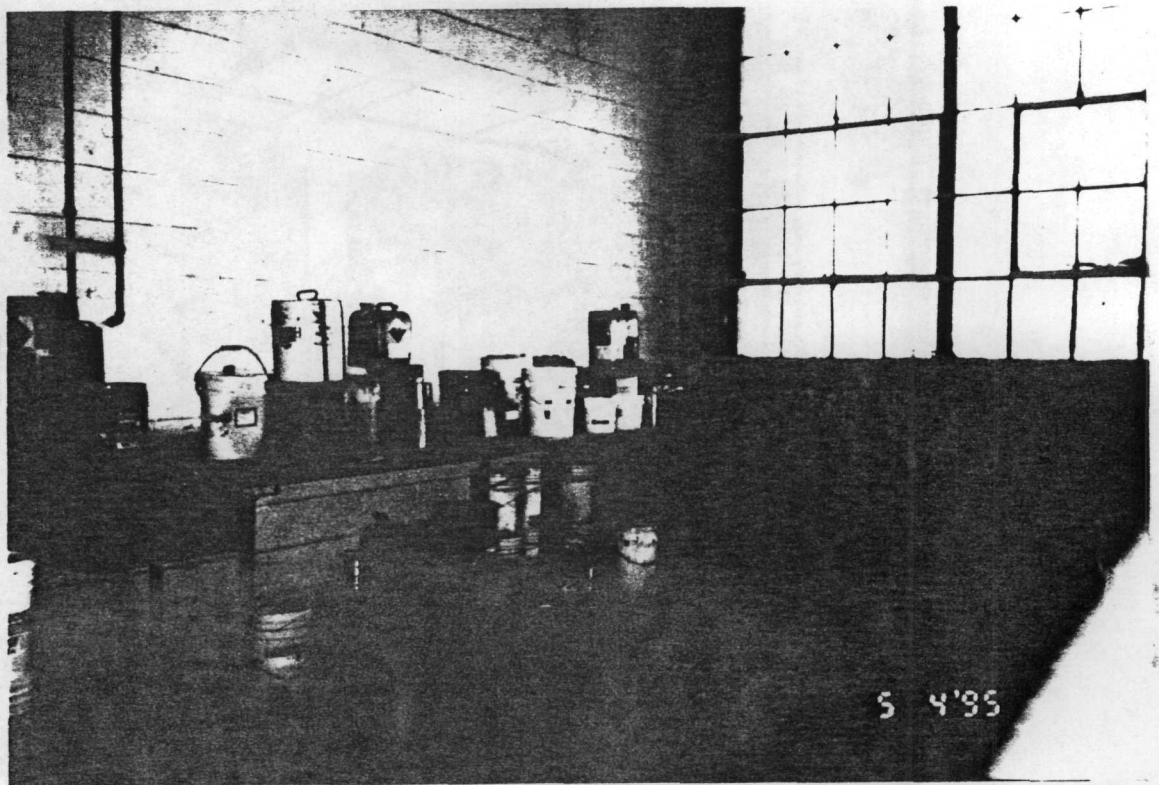
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 SUBJECT: VIEW OF ABANDONED CONTAINERS.



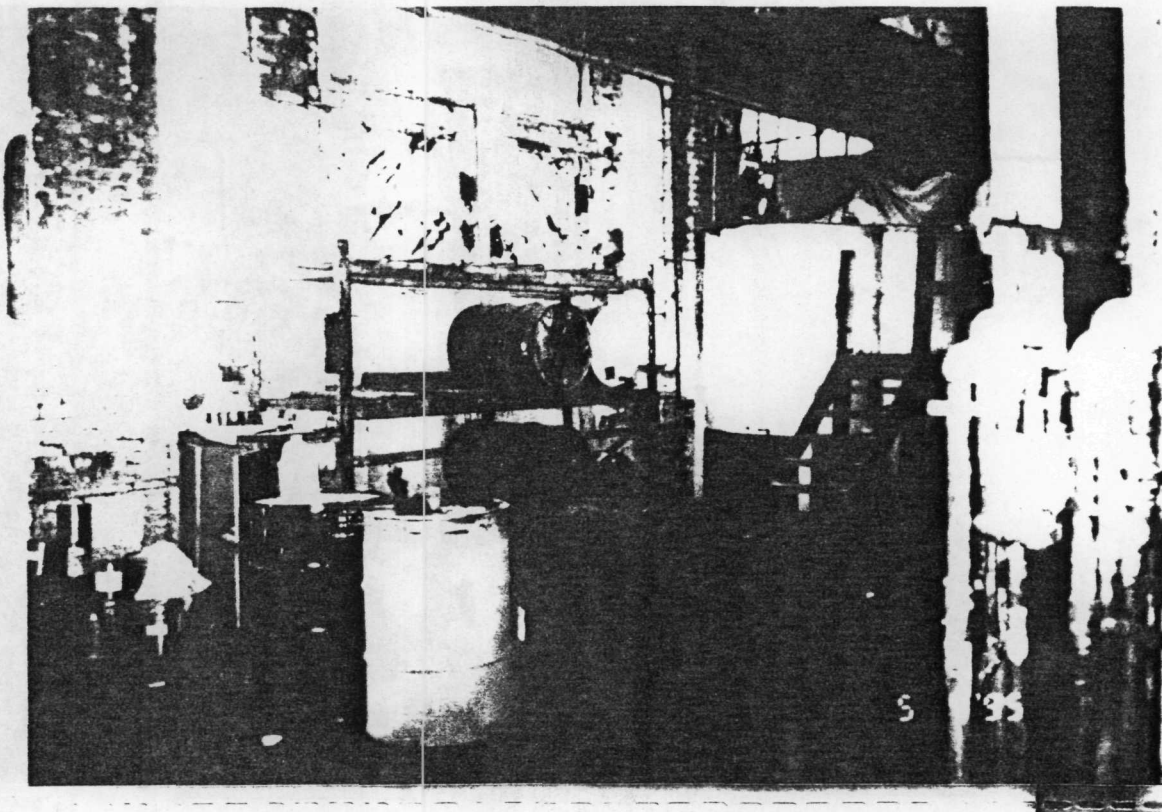
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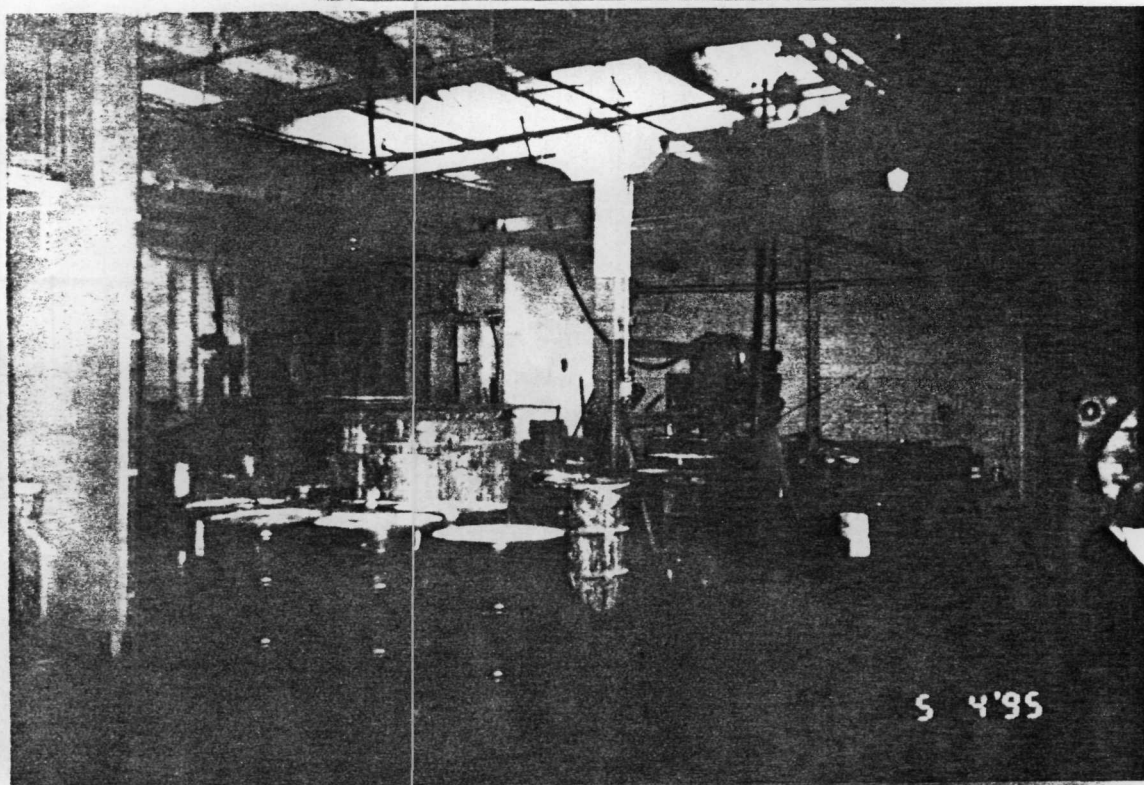
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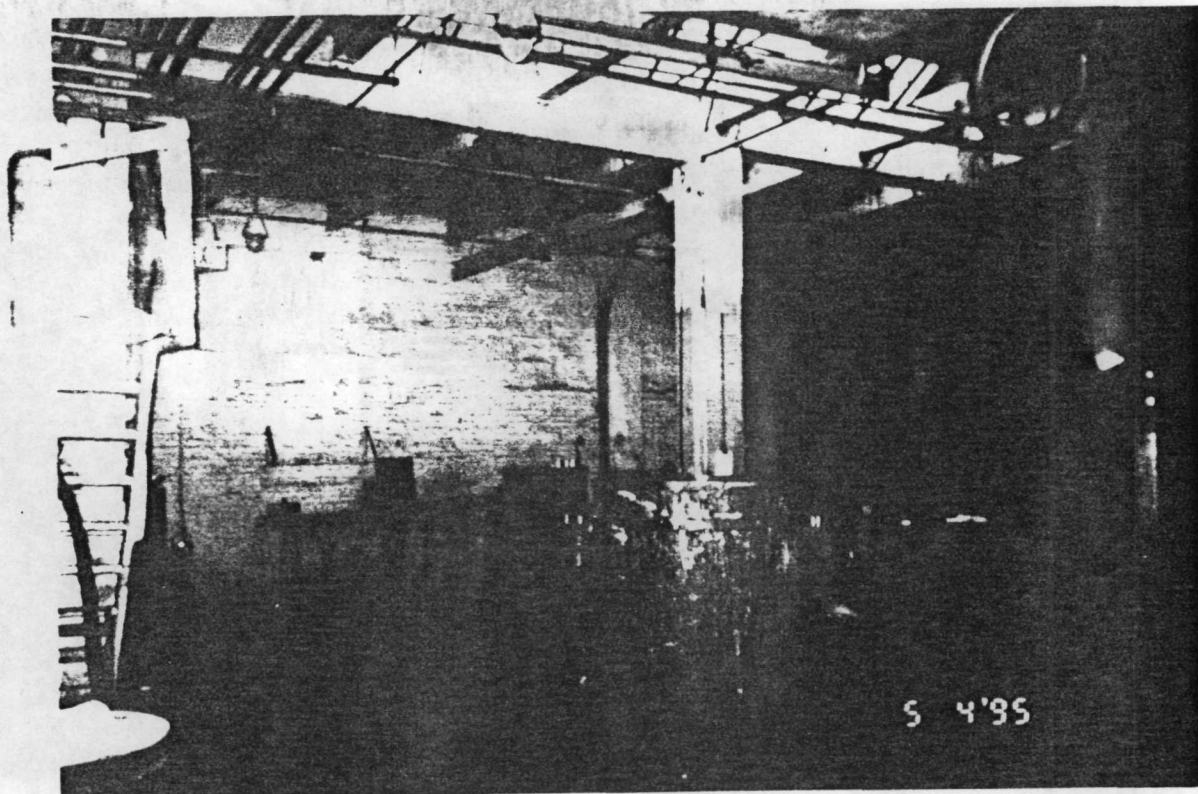
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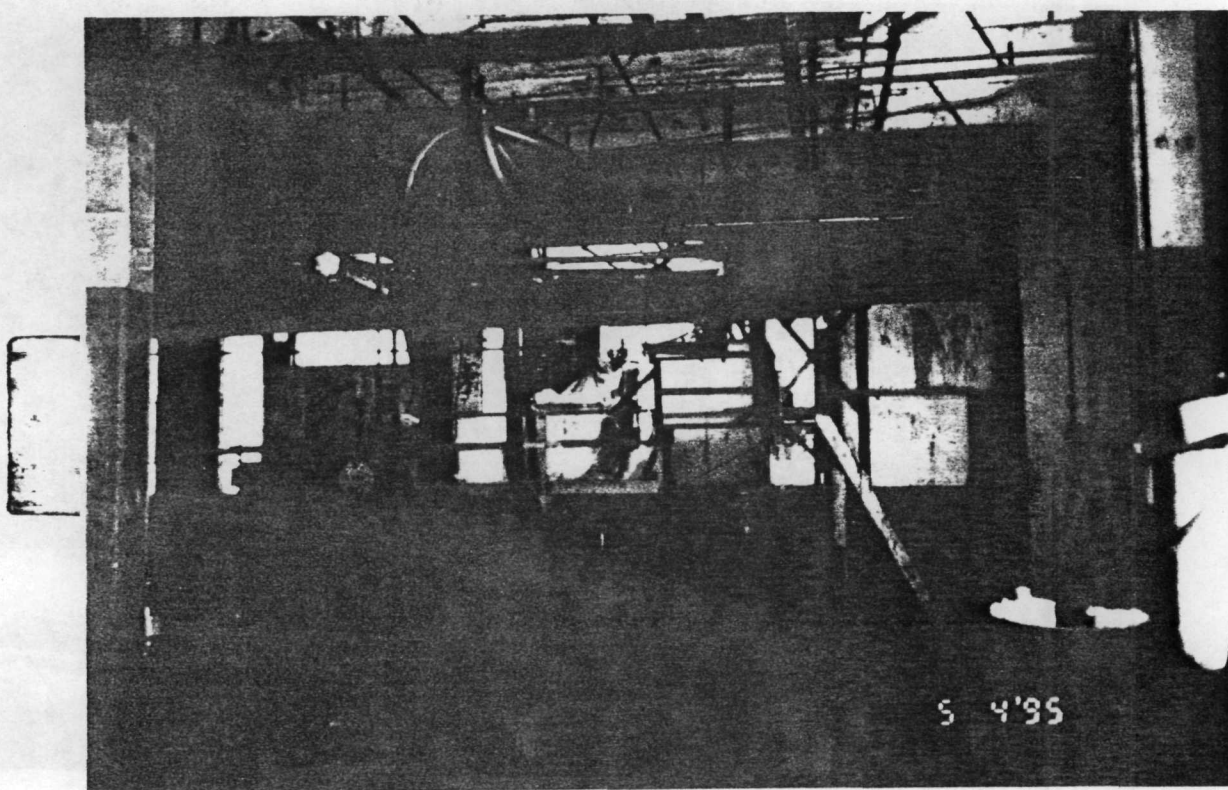
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 DIRECTION: ---

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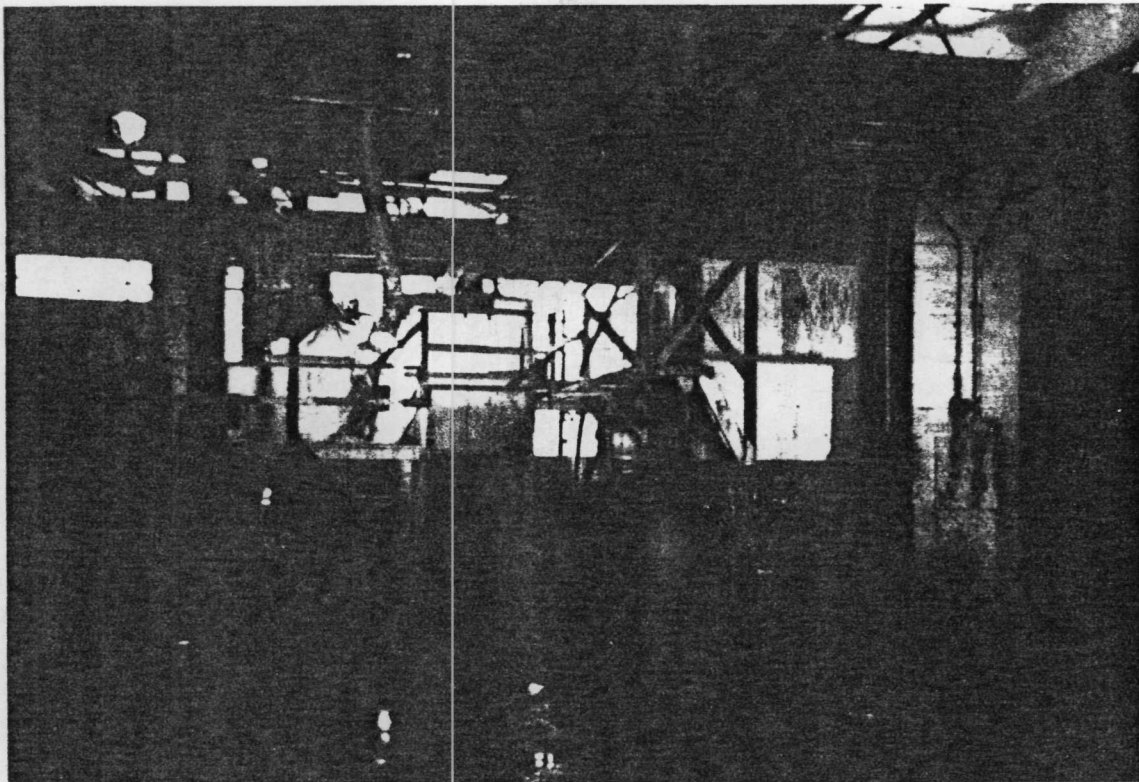
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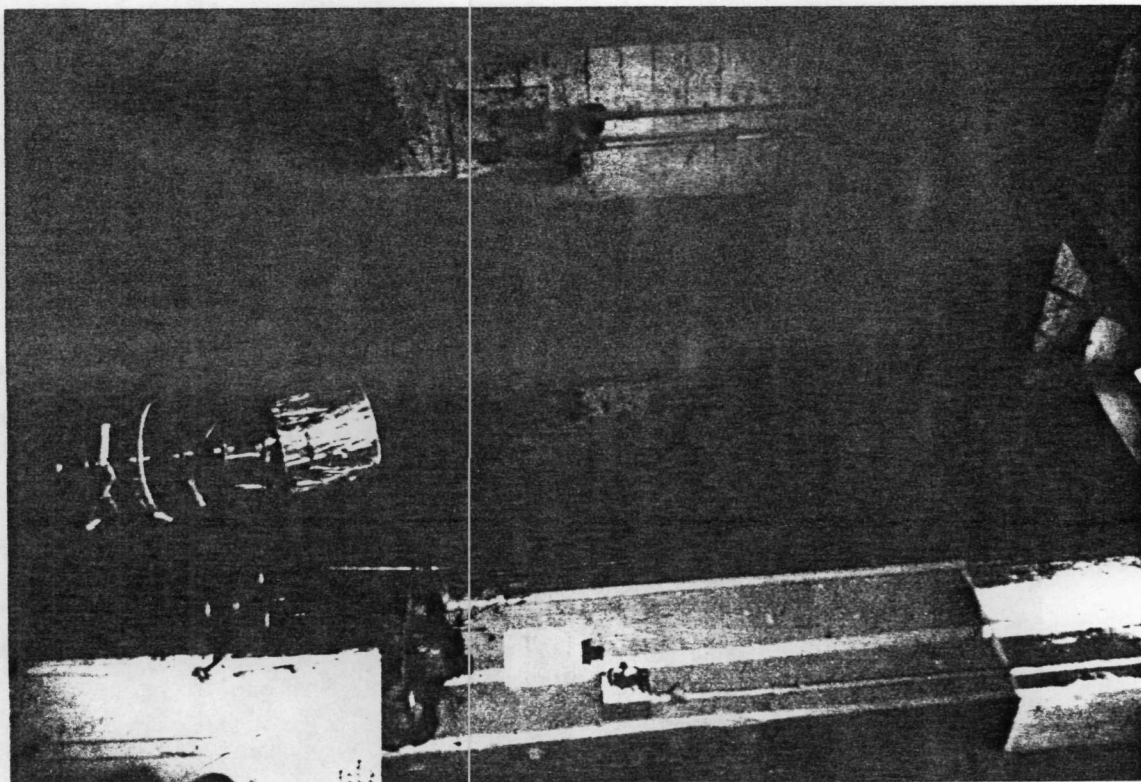
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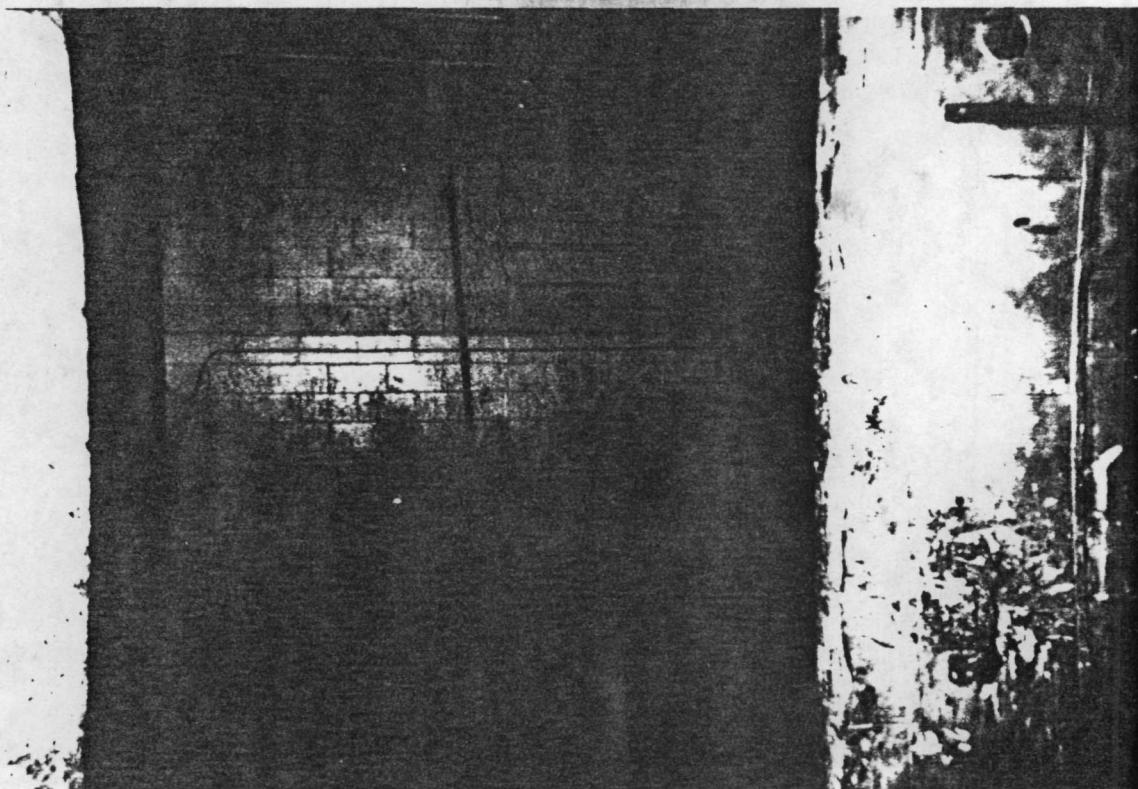
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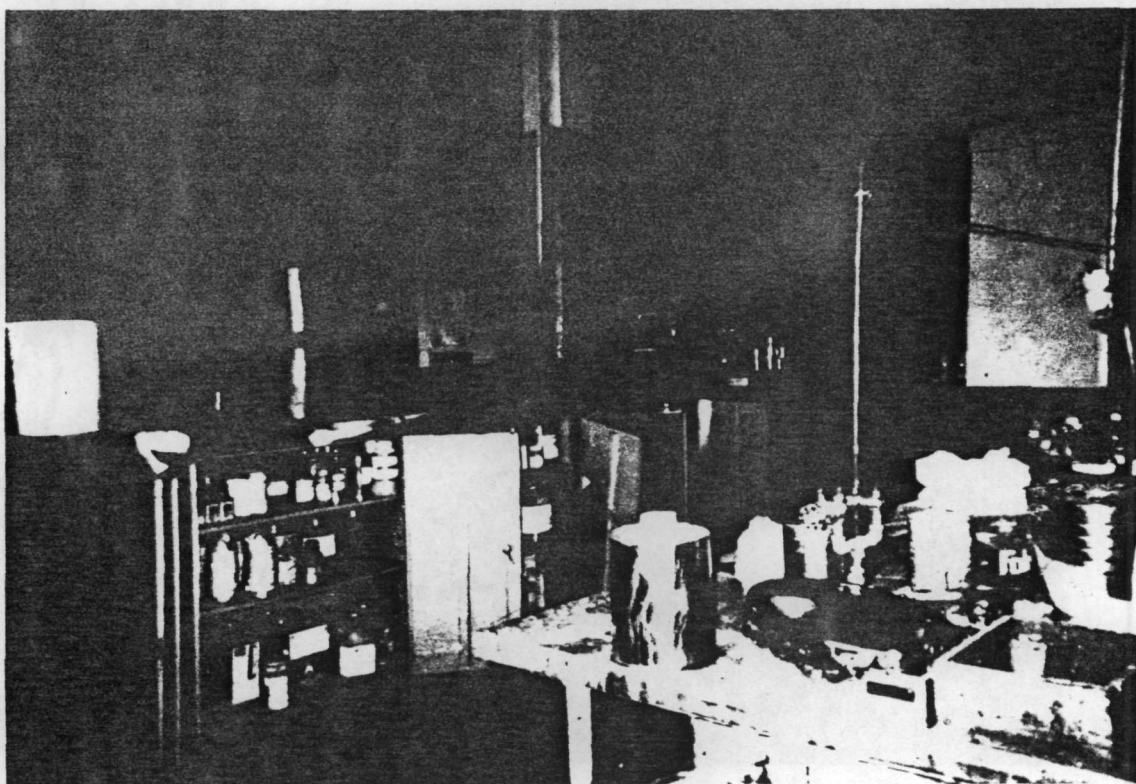
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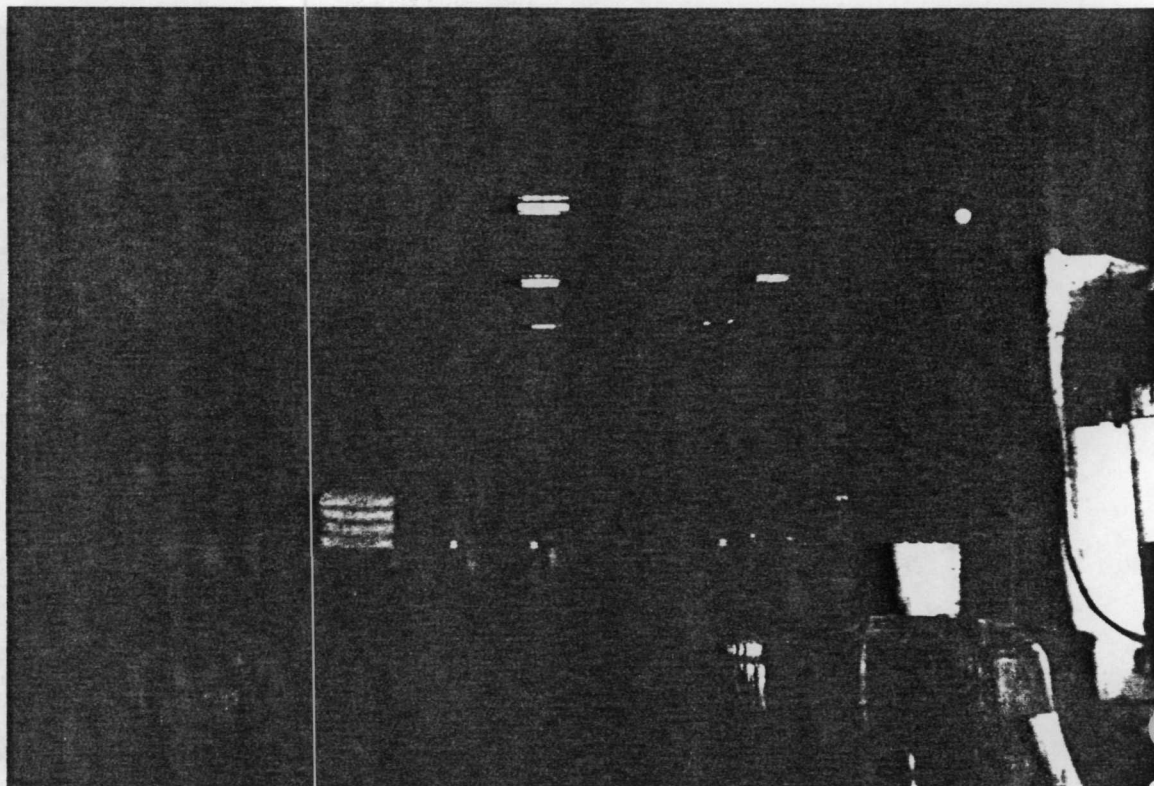
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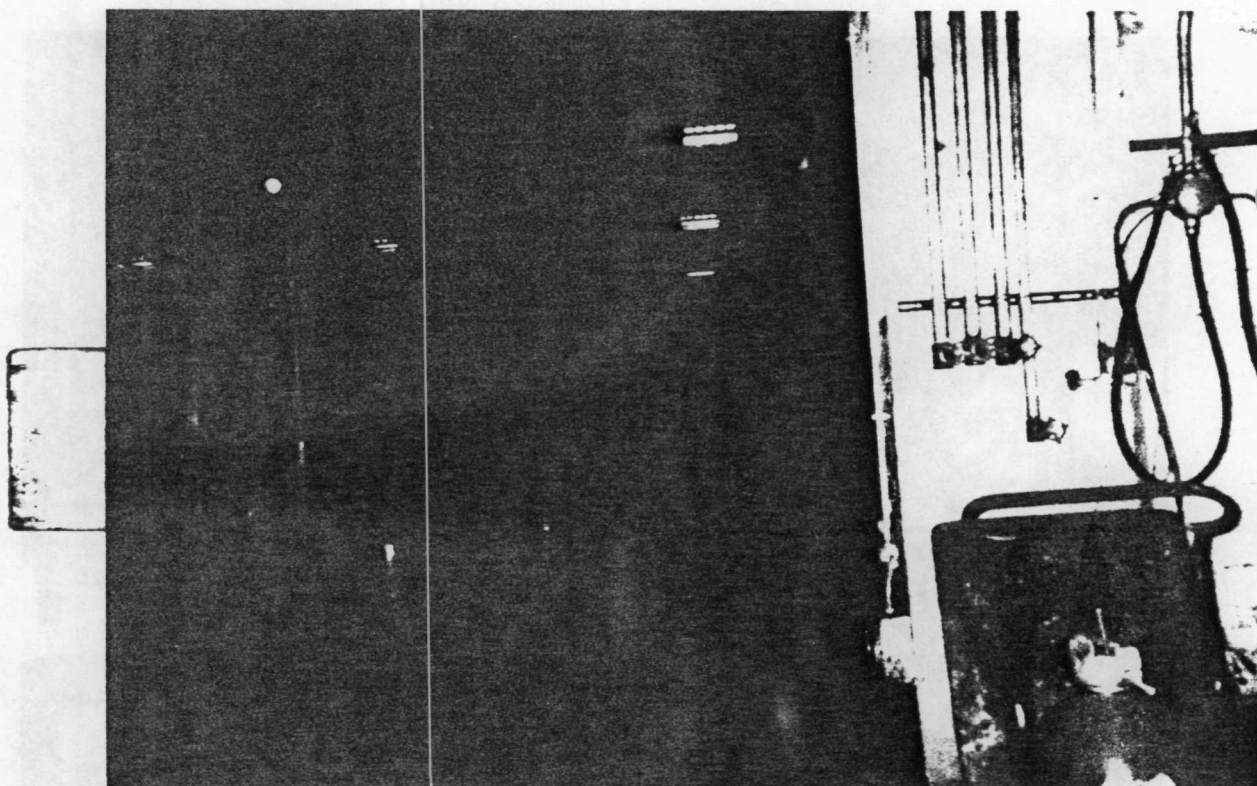
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 SUBJECT: VIEW OF NUMEROUS CONTAINERS IN LAB AREA.



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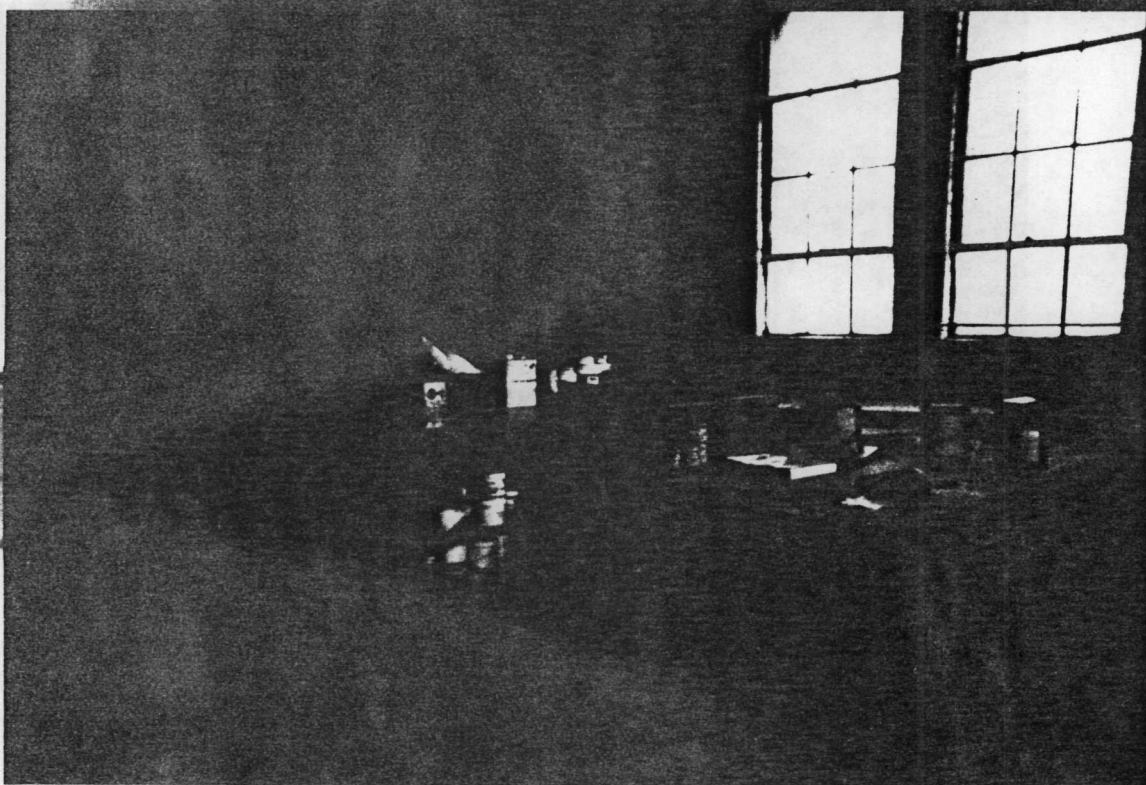
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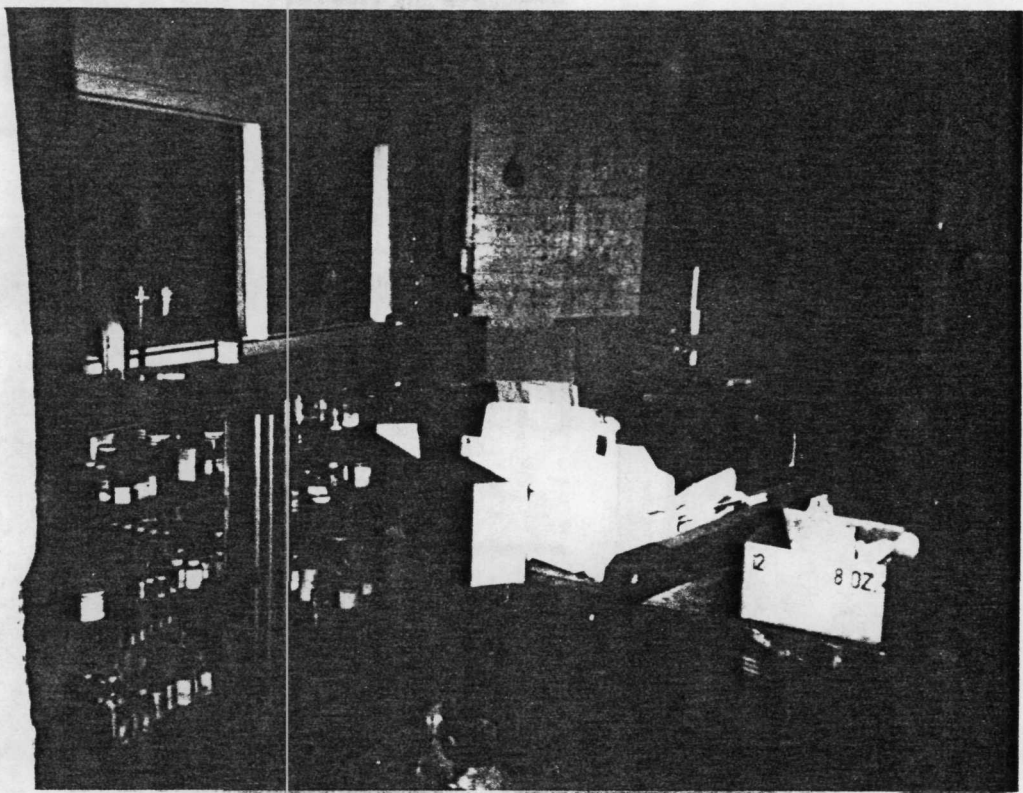
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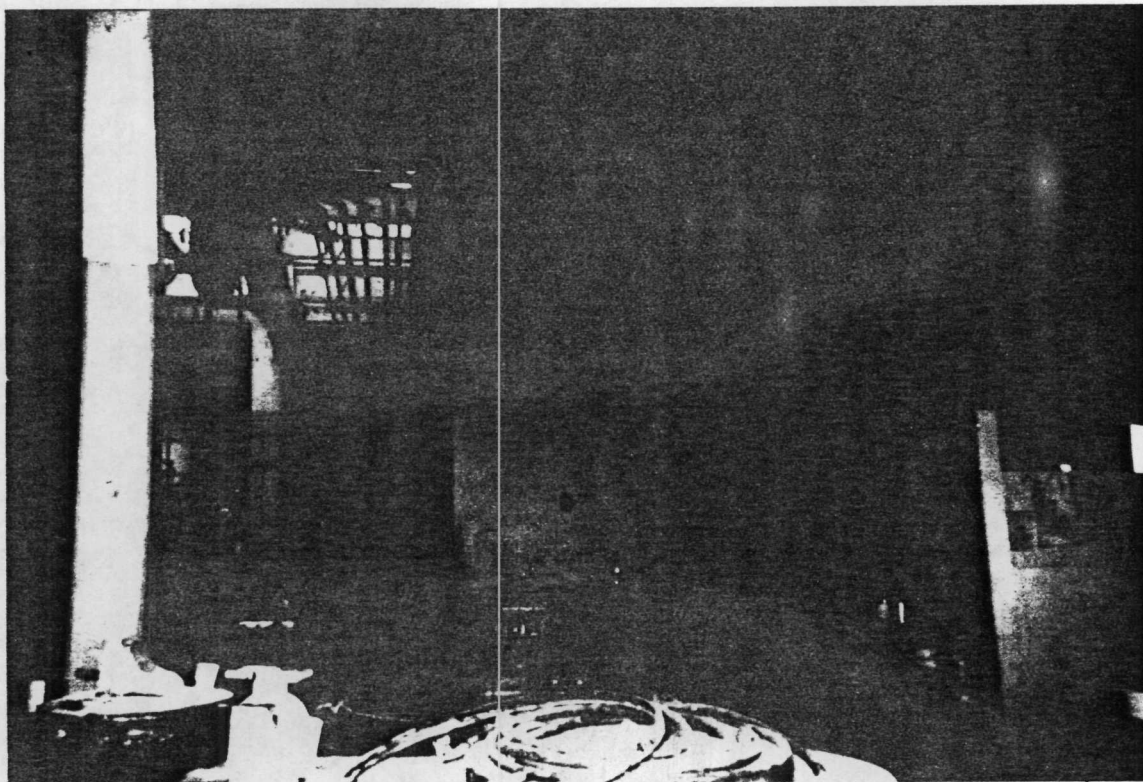
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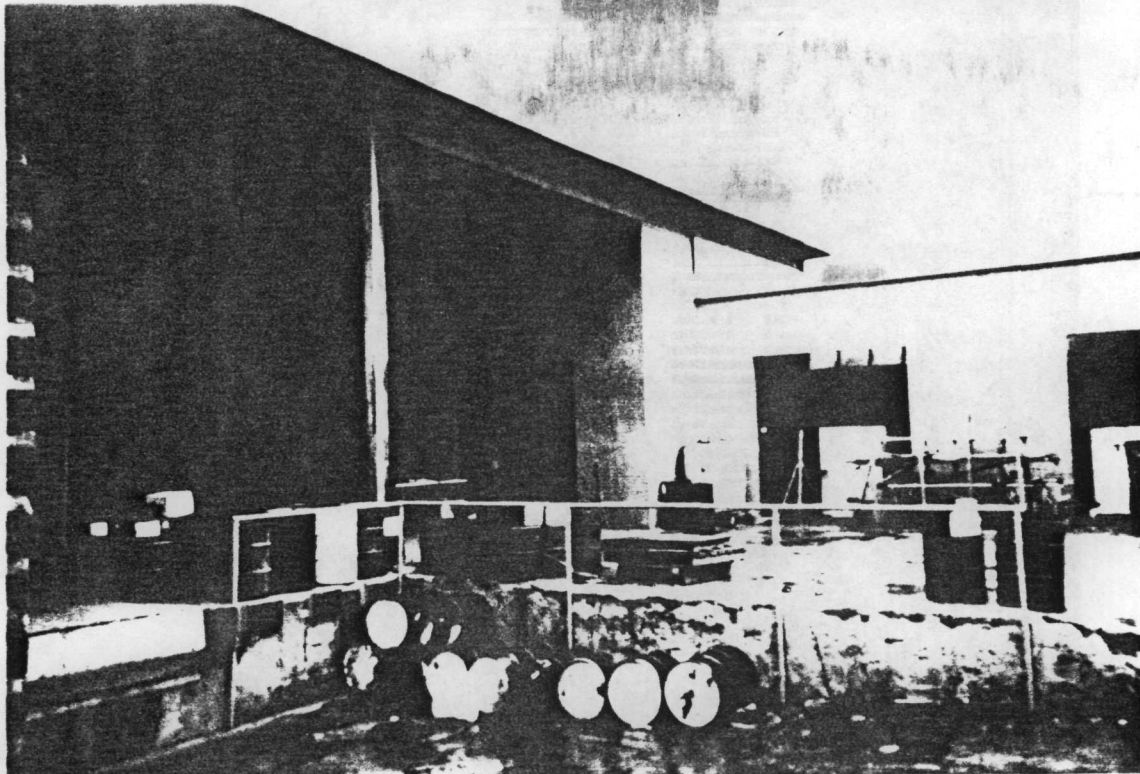
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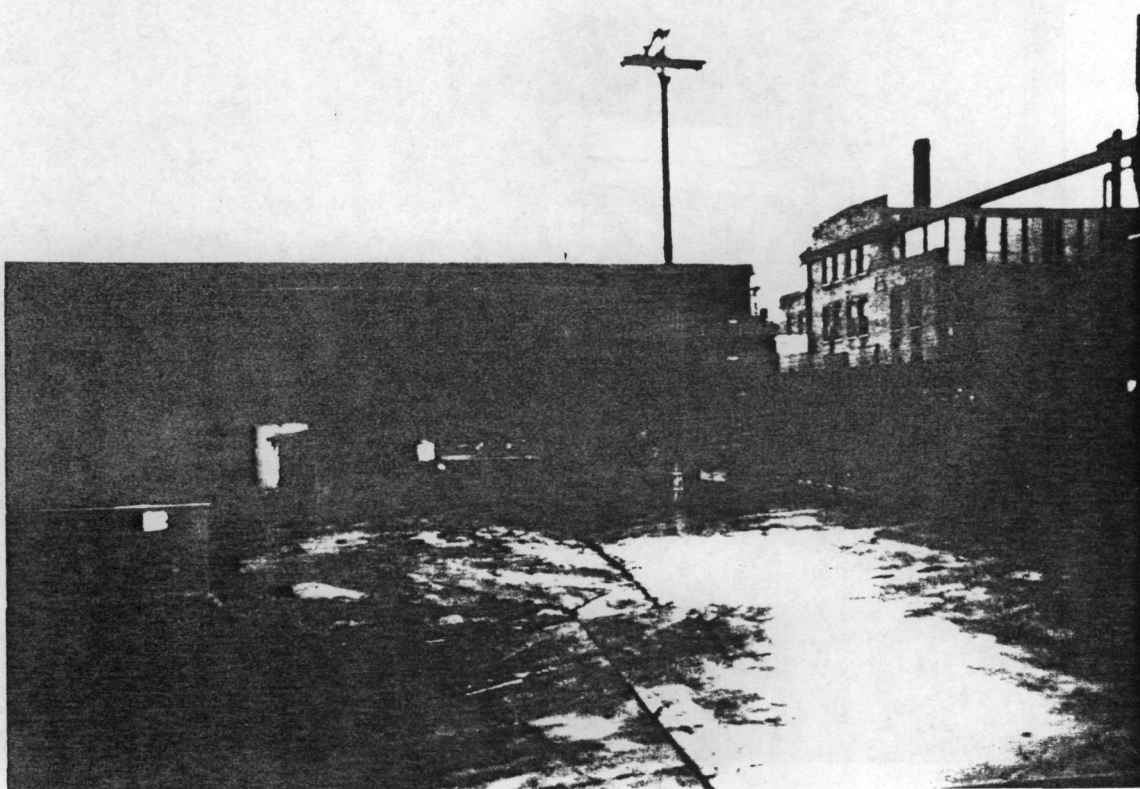
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 PHOTOGRAPHER: BRIGID BROOKS

CAMERA: FUJI DISCOVERY PLUS 80
 FILM: KODAK GOLD 100 ASA, 24 EXPOSURE
 SUBJECT: VIEW OF DRUMS IN FACILITY.



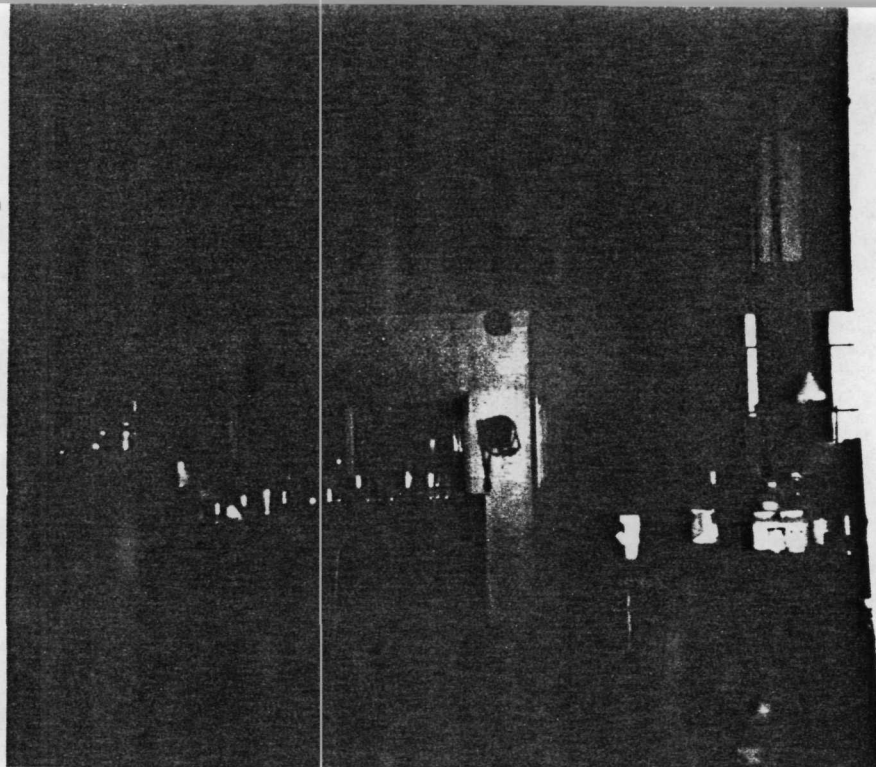
SITE NAME: DC FRANCHE METAL COATINGS
 TDD #: T05-9504-015
 DATE: 5-4-95
 TIME: 1000
 DIRECTION: WEST
 PHOTOGRAPHER: BRIGID BROOKS

CAMERA: FUJI DISCOVERY PLUS 80
 FILM: KODAK GOLD 100 ASA, 24 EXPOSURE
 SUBJECT: VIEW OF ABANDONED DRUMS IN DOCK AREA.



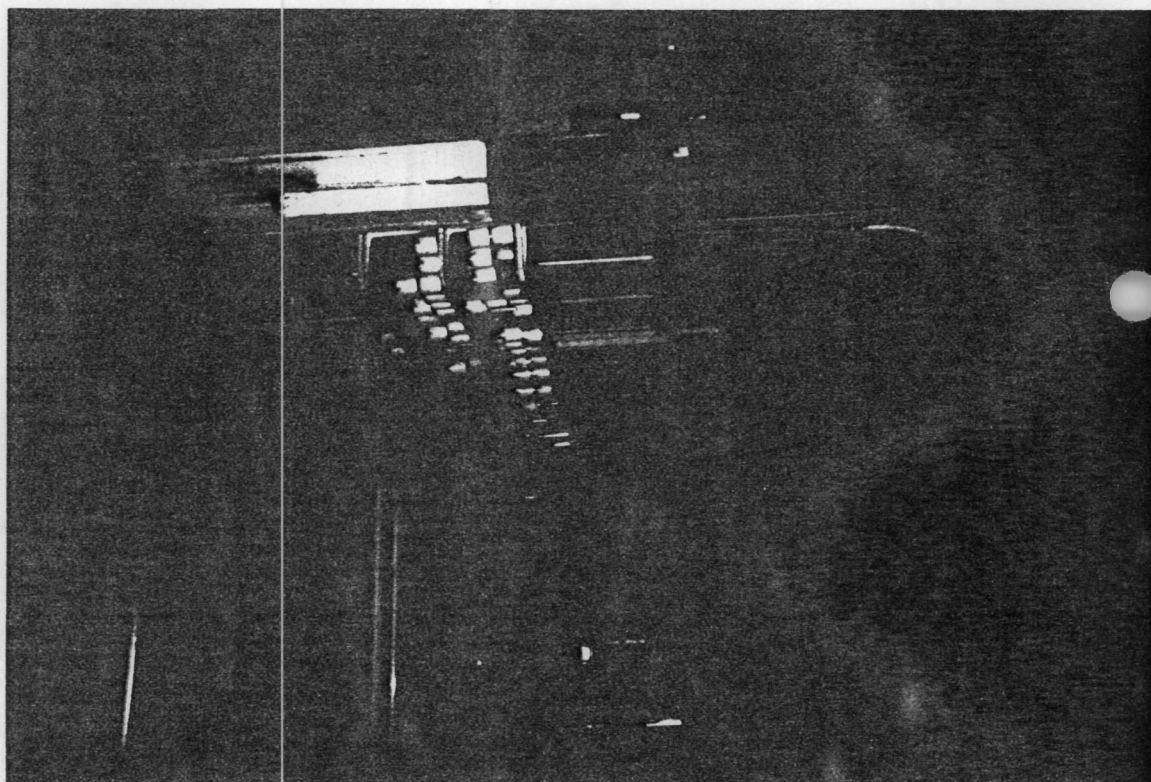
SITE NAME: DC FRANCHE METAL COATINGS
 TDD #: T05-9504-015
 DATE: 5-4-95
 TIME: 1000
 DIRECTION: WEST
 PHOTOGRAPHER: BRIGID BROOKS

CAMERA: FUJI DISCOVERY PLUS 80
 FILM: KODAK GOLD 100 ASA, 24 EXPOSURE
 SUBJECT: VIEW OF BAY AREAS WEST OF LOADING DOCK.



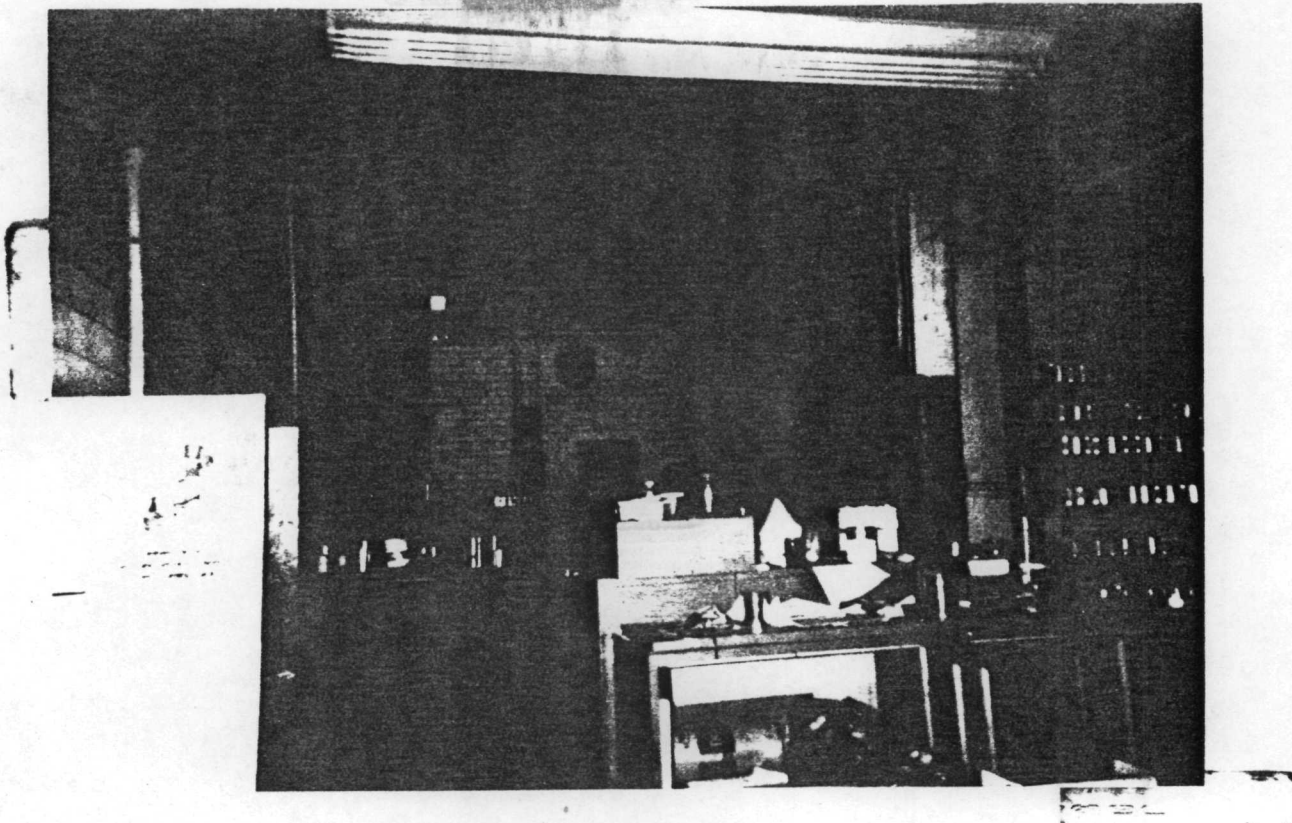
SITE NAME: DC FRANCHE METAL COATINGS
 TDD #: T05-9504-015
 DATE: 5-4-95
 TIME: 1000
 DIRECTION: NORTH
 PHOTOGRAPHER: BRIGID BROOKS

CAMERA: FUJI DISCOVERY PLUS 80
 FILM: KODAK GOLD 100 ASA, 24 EXPOSURE
 SUBJECT: VIEW OF LAB AREA.



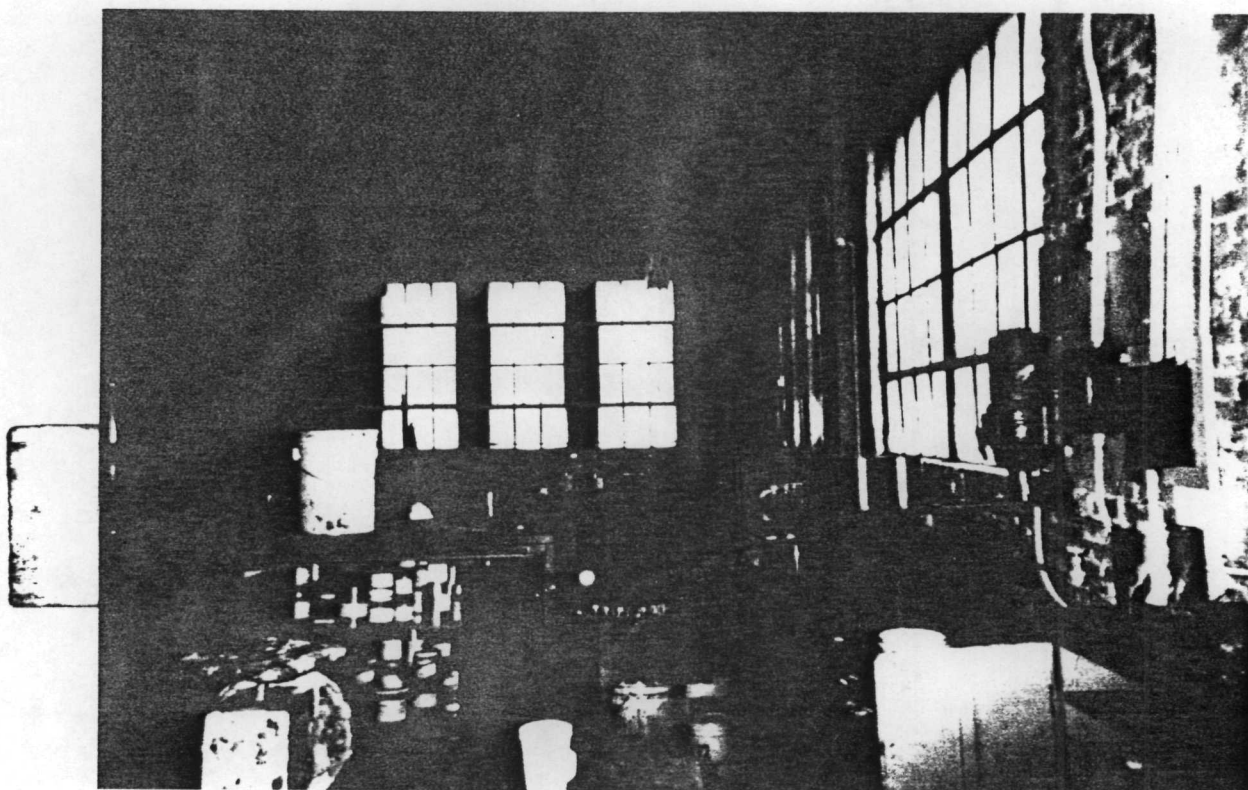
SITE NAME: DC FRANCHE METAL COATINGS
 TDD #: T05-9504-015
 DATE: 5-4-95
 TIME: 1000
 DIRECTION: SOUTH
 PHOTOGRAPHER: BRIGID BROOKS

CAMERA: FUJI DISCOVERY PLUS 80
 FILM: KODAK GOLD 100 ASA, 24 EXPOSURE
 SUBJECT: VIEW OF CONTAINERS WEST OF LAB AREA.



SITE NAME: DC FRANCHE METAL COATINGS
 TDD #: T05-9504-015
 DATE: 5-4-95
 TIME: 1000
 DIRECTION: SOUTH
 PHOTOGRAPHER: BRIGID BROOKS

CAMERA: FUJI DISCOVERY PLUS 80
 FILM: KODAK GOLD 100 ASA, 24 EXPOSURE
 SUBJECT: VIEW OF LAB AREA.



SITE NAME: DC FRANCHE METAL COATINGS
 TDD #: T05-9504-015
 DATE: 5-4-95
 TIME: 1000
 DIRECTION: NORTH
 PHOTOGRAPHER: BRIGID BROOKS

CAMERA: FUJI DISCOVERY PLUS 80
 FILM: KODAK GOLD 100 ASA, 24 EXPOSURE
 SUBJECT: VIEW OF LAB AREA.

APPENDIX B
ANALYTICAL DATA PACKAGE



ecology and environment, inc.

International Specialists in the Environment

111 West Jackson Boulevard

Chicago, Illinois 60604

Tel: (312) 663-9415 Fax: (312) 663-0791

M E M O R A N D U M

DATE: June 5, 1995

TO: John Sherrard, TAT Project Manager, E & E, Chicago, IL

FROM: David Hendren, TAT Analytical Services Manager, E & E, Chicago, IL

THROUGH: Mary Jane Ripp, TAT QA Reports Manager, E & E, Chicago, IL

SUBJECT: General Data Quality Review for Flash Point and pH, DC Franche Metal Coating, Chicago, Cook County, IL

REFERENCE: Project TDD T05-9504-015 Analytical TDD T05-9503-803
Project PAN EIL0884VAA Analytical PAN EIL0884AAA

The data quality assurance (QA) review of four drum samples collected from the DC Franche Metal Coating site is complete. The samples were collected on May 4, 1995, by the Technical Assistance Team (TAT) contractor, Ecology and Environment, Inc. (E & E). The samples were submitted to Heritage Laboratories, Inc., Romeoville, Illinois. The laboratory analyses were performed according to United States Environmental Protection Agency Solid Waste 846 method 9045A for pH and by Cleveland Open Cup Flash Point ASTM D-92 for flash point.

Sample Identification

<u>E & E</u> <u>Identification No.</u>	<u>Laboratory</u> <u>Identification No.</u>
L-1	C168937
L-2	C168938
L-3	C168939
L-4	C168940

Data Qualifications:

I. Sample Holding Time: Acceptable

The samples were collected on May 4, 1995, and analyzed for pH on May 10, 1995, and for flash point on May 13, 1995. There are no specific holding time criteria for these parameters.

II. Calibration: Acceptable

The calibration of the pH meter was acceptable before and following sample analysis. Duplicate analyses for flash point yielded identical results.

III. Overall Assessment of Data For Use: Acceptable

The overall usefulness of the data is based on criteria for QA Level II as outlined in the Office of Solid Waste and Emergency Response (OSWER) Directive 9360.4-01 (April, 1990) Data Validation Procedures, Section 9.0, Generic Data Validation Procedures. Based upon the information provided, the data are acceptable for use.

P R E L I M I N A R Y C E R T I F I C A T E

Service Location HERITAGE ENVIRONMENTAL SERVICES, INC. COMMERCIAL LABORATORY OPERATIONS 1319 MARQUETTE DRIVE ROMEOVILLE, IL 60441 (708)378-1600	Received	Project	Lab ID
	09-MAY-95		C168937
	Complete PROCESSIN	PO Number VERBAL	
	Printed	Sampled	
	23-MAY-95	04-MAY-95 10:00	

Report To D. HENDRON ECOLOGY & ENVIRONMENT, INC. 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604	Bill To ACCOUNTS PAYABLE ECOLOGY AND ENVIRONMENT, INC. 111 WEST JACKSON BLVD. CHICAGO, IL 60604
Sample Description SAMPLE ID: L-1 DESCRIPTION: DRUM - GRAB PROJECT NO.: ZT3054 PROJECT NAME: T059503803	

PH (S/S/S) SW846-9045A Analyst: A. SNAPP Analysis Date: 10-MAY-95 Test: G624.0.0			
Parameter	Result	Det. Limit	Units
PH	< 1	0.1	Std. Units

Sample Comments < <i>Less Than Lower Detection Limit</i> <i>Sample chain of custody number 5-40706.</i> <i>This Certificate shall not be reproduced, except in full,</i> <i>without the written approval of the lab.</i>
--

Preliminary Certificate : *J. Anderson*

P R E L I M I N A R Y C E R T I F I C A T E

Service Location HERITAGE ENVIRONMENTAL SERVICES, INC. COMMERCIAL LABORATORY OPERATIONS 1319 MARQUETTE DRIVE ROMEOVILLE, IL 60441 (708)378-1600	Received 09-MAY-95	Project	Lab ID C168938
	Complete PROCESSIN	PO Number VERBAL	
	Printed 23-MAY-95	Sampled 04-MAY-95 10:10	

Report To D. HENDRON ECOLOGY & ENVIRONMENT, INC. 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604	Bill To ACCOUNTS PAYABLE ECOLOGY AND ENVIRONMENT, INC. 111 WEST JACKSON BLVD. CHICAGO, IL 60604
---	--

SAMPLE ID: L-2 DESCRIPTION: DRUM - GRAB PROJECT NO.: ZT3054 PROJECT NAME: T059503803	Sample Description
---	---------------------------

CLEVELAND OPEN CUP FLASHPOINT ASTM D-92			
Analyst: A. SNAPP		Analysis Date: 13-MAY-95	
		Test: G515.9.0	
Parameter	Result	Det. Limit	Units
FLASH POINT	68		Degrees F

Sample Comments
Sample chain of custody number 5-40706. This Certificate shall not be reproduced, except in full, without the written approval of the lab.

P R E L I M I N A R Y C E R T I F I C A T E

Service Location HERITAGE ENVIRONMENTAL SERVICES, INC. COMMERCIAL LABORATORY OPERATIONS 1319 MARQUETTE DRIVE ROMEOVILLE, IL 60441 (708)378-1600	Received 09-MAY-95	Project	Lab ID C168939
	Complete PROCESSIN	PO Number VERBAL	
	Printed 23-MAY-95	Sampled 04-MAY-95 10:20	

Report To	Bill To
D. HENDRON ECOLOGY & ENVIRONMENT, INC. 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604	ACCOUNTS PAYABLE ECOLOGY AND ENVIRONMENT, INC. 111 WEST JACKSON BLVD. CHICAGO, IL 60604

SAMPLE ID: L-3 DESCRIPTION: DRUM - GRAB PROJECT NO.: ZT3054 PROJECT NAME: T059503803	Sample Description
---	--------------------

CLEVELAND OPEN CUP FLASHPOINT ASTM D-92 Analyst: A. SNAPP Analysis Date: 13-MAY-95 Test: G515.9.0			
Parameter	Result	Det. Limit	Units
FLASH POINT	66		Degrees F

Sample Comments
Sample chain of custody number 5-40706. This Certificate shall not be reproduced, except in full, without the written approval of the lab.

P R E L I M I N A R Y C E R T I F I C A T E

Service Location HERITAGE ENVIRONMENTAL SERVICES, INC. COMMERCIAL LABORATORY OPERATIONS 1319 MARQUETTE DRIVE ROMEOVILLE, IL 60441 (708)378-1600	Received	Project	Lab ID
	09-MAY-95		C168940
	Complete	PO Number	
	PROCESSIN	VERBAL	
	Printed	Sampled	
	23-MAY-95	04-MAY-95 10:40	

Report To D. HENDRON ECOLOGY & ENVIRONMENT, INC. 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604	Bill To ACCOUNTS PAYABLE ECOLOGY AND ENVIRONMENT, INC. 111 WEST JACKSON BLVD. CHICAGO, IL 60604
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SAMPLE ID: L-4 DESCRIPTION: DRUM - GRAB PROJECT NO.: ZT3054 PROJECT NAME: T059503803	Sample Description
---	--------------------

CLEVELAND OPEN CUP FLASHPOINT ASTM D-92			
Analyst: A. SNAPP	Analysis Date: 13-MAY-95	Test: G515.9.0	
Parameter	Result	Det. Limit	Units
FLASH POINT	69		Degrees F

Sample Comments
Sample chain of custody number 5-40706. This Certificate shall not be reproduced, except in full, without the written approval of the lab.

APPENDIX C
RCMS COST ESTIMATE

COST SUMMARY

"Contractor Costs" redacted - not relevant to the selection of the removal action.

Government
Other Direct Costs (ODC)

Page: 1

Projection Name: DC FRANCHE METALS
Projection Type: Initial

Date: 05/31/95

Description	Ctr. Code	Vend Code	Cost Type	Unit Cost	Units	Qty	Task Code	Task Description	Projected Cost	Total Cost
MISC.	TAT		Materials/Supplies	1500.00	Bulk	1.0	06	Administrative	4890	4890
(ODC Totals:)									4,890	4,890
(Including Site Contingency:15.00%)										5,624

Government
Personnel by CLIN

Page: 1

Projection Name: DC FRANCHE METALS
Projection Type: Initial

Date: 05/31/95

CLIN	Job Description	Ctr. Code	Regular Hrs/Day	O.T. Hrs/Day	Regular Rate	O.T. Rate	Qty	No. of Days	Task Code	Task Description	Projected Cost	Total Cost
S1-05-01	On Scene Coordinator	EPA	8.0	2.0	30.00	30.00	1	90	06	Administrative	74250	74250
S4-05-01	Chemist / Organic	TAT	8.0	2.0	35.00	35.00	1	25	06	Administrative	28525	28525
S4-15-01	Engineer / Civil	TAT	8.0	2.0	35.00	35.00	1	90	06	Administrative	102690	102690
S4-30-01	Ind Hygenist/Safety	TAT	8.0	0.0	35.00	35.00	1	2	06	Administrative	1826	1826
(Personnel Totals:)											207,291	207,291
(Including Site Contingency:15.00%)												238,385